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8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,)	Case No. 08cv 963-IEG (CAB)
)	
11 Petitioner,)	JOINT MOTION TO DISMISS PETITION
)	AND ORDER TO SHOW CAUSE AS MOOT
12 v.)	
)	[Fed. R. Civ. P. 41(a)(1)]
13 DAVID REYES, JR.,)	
)	
14 Respondent.)	
_____)	

15
16 COME NOW THE PARTIES, Petitioner United States of America by and through counsel,
17 Karen P. Hewitt, United States Attorney, and Raven M. Norris, Assistant United States Attorney, and
18 Respondent David Reyes, Jr., by and through counsel, Betty Williams, and hereby jointly move the
19 Court to dismiss this action without prejudice. The parties have resolved the matters alleged in the
20 Petition to Enforce Internal Revenue Summons ("IRS") filed by the United States on May 30, 2008 and
21 Order to Show Cause Re: Enforcement of IRS Summons issued by this Court on June 6, 2008.
22 Respondent has complied with the issued IRS Summons. Accordingly, the parties agreed that the
23 above-captioned case should be dismissed in its entirety without prejudice. It was further agreed that
24 each party will bear its own attorneys' fees and costs of suit.

25 Based upon the foregoing, it is respectfully requested that the Court enter an order dismissing
26 the action without prejudice.

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1 Dated: August 11, 2008

Respectfully submitted,

2 KAREN P. HEWITT
3 United States Attorney

4 s/ Raven M. Norris
5 RAVEN M. NORRIS
6 Assistant U.S. Attorney
7 Attorneys for Petitioner

8 Dated: August 11, 2008

s/ Betty Williams
9 BETTY WILLIAMS
10 Attorney for Respondent

11 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures
12 of the United States District Court for the Southern District of California, I certify that the content of
13 this document is acceptable to counsel for the Respondent and that I have obtained authorization from
14 Betty Williams to affix her electronic signature to this document..

15 DATED: August 11, 2008

KAREN P. HEWITT
United States Attorney

16 s/Raven M. Norris
17 Assistant U. S. Attorney
18 Attorney for Defendants
19 Email: Raven.Norris@usdoj.gov
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 08CV 0963 IEG(CAB)
)
Petitioner,) CERTIFICATE OF SERVICE
)
v.)
)
DAVID REYES JR.,)
)
Respondent.)
_____)

IT IS HEREBY CERTIFIED THAT:

I, Raven M. Norris, am a citizen of the United States and am at least eighteen years of age. My business address is 880 Front Street, Room 6293, San Diego, California 92101-8893.

I am not a party to the above-entitled action. I have caused service of the Joint Motion to Dismiss Petition as Moot on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

Betty Williams, esq.
Mopstick & Williams LLP
email: Betty@mopstickwilliams.com

I hereby certify that I have caused the foregoing to be mailed, by the United States Postal Service, to the following non-ECF participants on this case:

None

the last known address, at which place there is delivery service of mail from the United States Postal Service.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 11, 2008

s/ Raven M. Norris
RAVEN M. NORRIS